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HARRISBURG, PA

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MMA

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA AUG 26 2002

BARBARA A. WILHELM,
Plaintiff

v.

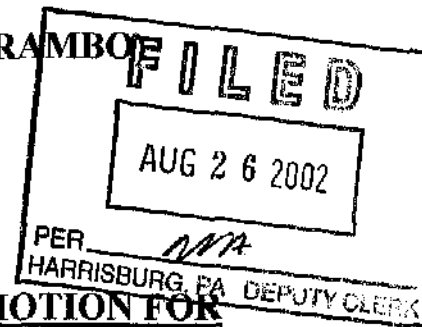
COMMONWEALTH OF PA.;
PENNSYLVANIA STATE POLICE;

Defendant

MARY E. D'ANDREA, CLERK
Per 9/18
Deputy Clerk

NO. 1:CV-01-1057

(JUDGE RAMBO)



**PLAINTIFF'S CONCURRED-IN NUNC PRO TUNC MOTION FOR
AN ENLARGEMENT OF TIME TO FILE A PRETRIAL
MEMORANDUM**


Pursuant to Fed.R.Civ.P. 6(b), Plaintiff, Barbara A. Wilhelm, by and through her attorney, Nathan C. Pringle, Jr., respectfully requests an enlargement of time of 1 day, until August 26 2002, to file Plaintiff's Pretrial Memorandum, and in support thereof, sets forth the following:

1. This action alleges retaliation in connection with plaintiff's employment with the Pennsylvania State Police.
2. The complaint raises factual and legal issues in connection with her dismissal and retaliation in violation of Title VII and the Pennsylvania Human Relations Act.
3. Plaintiff's pretrial memorandum was due on August 23, 2002.

4. On August 23, 2002, after plaintiff's pretrial memorandum was substantially completed several pages were lost due to problems with counsel's word processing software.
5. The lost pages could be not be replaced until well after 5:00 p.m.
6. Counsel contacted this Honorable Court's office at approximately 4:00 p.m., but was not able to reach Judge Rambo.
7. The requested enlargement of time is small and will not delay the disposition of this matter nor will it prejudice the defendant as it is will be delivered at 8:30 a.m. August 26, 2002.
8. Counsel for defendant, Susan J. Forney, has no objection to this request for an enlargement of time, as indicated on the attached certificate of concurrence.

WHEREFORE, the plaintiff, Barbara A. Wilhelm, respectfully requests an enlargement of time of 1 day, to and including August 26, 2002, to file her pretrial memorandum.

Respectfully Submitted,



Nathan C. Pringle, Jr.
Attorney I. D. Number 30142
3601 North Progress Ave., Suite 200
Harrisburg, PA 17110
(717) 909-8520
Attorney for Plaintiff

August 23, 2002

**UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BARBARA A. WILHELM,
Plaintiff

v.

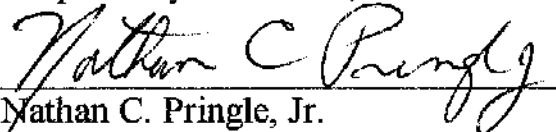
COMMONWEALTH OF PA.,
PENNSYLVANIA STATE POLICE,
Defendant

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: **NO. 1:CV-01-1057**
:
: **(JUDGE RAMBO)**
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:
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CERTIFICATE OF CONCURRENCE

Nathan C. Pringle, Esquire, counsel for the plaintiff, certified that on August 23, 2002, he spoke with Susan J. Forney, Esquire, counsel for defendant, regarding an enlargement of time to file a *nunc pro tunc* motion for an enlargement of time to file plaintiff's pretrial memorandum. Ms. Forney concurred in the request.

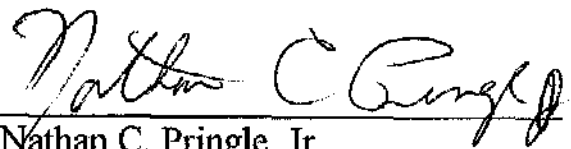
Respectfully Submitted,


Nathan C. Pringle, Jr.

CERTIFICATE OF SERVICE

I, Nathan C. Pringle, Jr., hereby certify that on August 26, 2002, I caused to be delivered hand delivered the foregoing document entitled plaintiff's *nunc pro tunc* motion for an enlargement of time file pretrial memorandum upon the following:

Susan J. Forney
Chief Deputy Attorney General
Office of Attorney General
Litigation Section
15th Floor, Strawberry Square
Harrisburg, PA 17120


Nathan C. Pringle, Jr.